

# DOCKET SECTION

EXHIBIT ANM-T1-1  
(revised 2-9-98)

RECEIVED

RESPONSES TO ANM SURVEY OF MAIL VOLUMES ENTERED IN FY 1996  
FOR WHICH COMMERCIAL STANDARD (A) RATES WERE PAID

199610 4 57 PM '98  
OFFICE OF THE CLERK OF THE HOUSE OF REPRESENTATIVES

	(1a)	(1b)	(2)	(3)	(4)	(5)
MAILER	PERMIT USED	HOW SHOWN	COMMERCIAL STANDARD (A) POSTAGE ORIGINALLY PAID		NONPROFIT STANDARD (A) POSTAGE ORIGINALLY PAID	
			Pieces Entered With Commercial Standard (A) Indicia	Pieces Entered With Nonprofit Standard (A) Indicia	Pieces On Which Commercial Standard (A) Rates Were Later Assessed	Did Mailer Submit Revised Form 3602?
1	NP	Indicia			15,000	yes
2	REGULAR	Indicia	50,000			
3	REGULAR	Indicia	22,291			
4	NP	Indicia/Meter				
5	NP	Indicia/meter				
6	NP	Indicia			1,000,000	no
7	NP	Indicia			5,300,000	no
8	NP	Meter		15,000		
9	NP	Indicia/Meter		45,641	6,050	no
10	NP	Meter		2,726		
11	NP	Indicia/Meter		25,000		
12	NP	Indicia/Meter		1,200		
13	NP	Indicia			500	no
14	NP	Indicia/Meter		10,000	10,000	yes
15	NP	Indicia		20,000		
16	REGULAR	Indicia	46,708			
17	REGULAR	Indicia	30,000			
18	REGULAR	Indicia	2,100			
19	NP	Indicia			560	yes
20	REGULAR	Indicia	750,000			
21	NP	Indicia			400,000	yes
22	NP	Indicia/Meter		102,170		
23	NP	Indicia		2,500	5,000	no
24	NP	Indicia		15,000		
25	REGULAR	Indicia	15,000			
26	NP	Indicia			1,081,278	no

	(1a)	(1b)	(2)	(3)	(4)	(5)
67	NP	Indicia			15,000	yes
68	NP	Indicia		10,000		unk
69	NP	Meter		4,000		unk
70	NP	Indicia		7,000		unk
71	NP	Indicia		30,000		unk
72	NP	Indicia		60,000		unk
73	NP	Indicia		6,000		unk
74	NP	Meter		3,603		unk
75	REGULAR	Indicia	10,000			
76	REGULAR	Indicia	10,000			
77	REGULAR	Meter	1,200			
78	REGULAR	Indicia	22,000			
79	NP	Indicia			640,000	yes
80	NP	Indicia		3,500		unk
81	NP	Indicia		4,800		unk
82	NP	Indicia		2,000		unk
83	NP	Indicia		50,000		yes
84	NP	Indicia		750		unk
85	NP	Indicia		6,000		unk
86	REGULAR	Meter	1,050			
87	NP	Indicia		5,000		unk
88	NP	Indicia		4,000		unk
89	REGULAR	Meter	3,500			
90	NP	Indicia		2,500		unk
91	NP	Indicia		2,500		unk
92	REGULAR	Indicia	15,000			
93	NP	Indicia		8,000		unk
94	NP	Indicia		80,000		yes
95	REGULAR	Indicia	50,000			
96	REGULAR	Meter	1,500			
97	REGULAR	Meter	2,000			
98	NP	Indicia		32,000		unk
99	REGULAR	Indicia	2,500			
100	NP	Indicia		2,500		unk
101	NP	Indicia		20,000		unk
102	NP	Indicia		6,000		unk
103	NP	Indicia		925		unk
104	REGULAR	Indicia	5,000			
105	REGULAR	Indicia	15,000			
106	REGULAR	Indicia	200,000			

	(1a)	(1b)	(2)	(3)	(4)	(5)
107	REGULAR	Indicia	71,000			
108	NP	Indicia		7,000		unk
<b>SUBTOTALS</b>			1,953,465	1,655,730	9,197,178	

**EXPLANATION AND NOTES**

**SUBJ:** Exhibit 1 - ANM-T1-1  
Responses to Survey of Alliance of Nonprofit Mailers  
Survey Conducted December 16, 1997 - Current

**PURPOSE:** As outlined in the testimony of Dr. John Haldi, the ANM has come to recognize that a significant volume of mail marked as "nonprofit" actually paid Standard (A) Regular rates in FY 1996, the base year in Docket No. R97-1.

To better learn the scope of this phenomenon, on December 9, 1997 the ANM submitted seven interrogatories (ANM/USPS-20-26) to the Postal Service.

ANM/USPS- 20 sought to learn how much volume of "nonprofit" mail was forced to pay regular rates because "the Postal Service determined, before or during entry of the mail, that it did not qualify" for nonprofit rates.

ANM/USPS - 21 sought to learn how much nonprofit mail was retroactively found to require commercial rates of postage because material in the mailpiece disqualified it for nonprofit rates.

ANM/USPS - 25 sought to learn how data were revised on USPS Form 3602s after a "nonprofit" mailing was forced to pay commercial rates.

Because the Postal Service has objected to these interrogatories, and refused to hold a technical conference to assess what partial information is or may be available from the Postal Service, and because an understanding of this pattern is important to this proceeding, the ANM has undertaken to collect as much data as can be produced within the limited resources and time available.

**KEY:** All volumes reported in this survey are of Standard Mail (A) Regular that was entered by nonprofit organizations at the commercial rate, or that was subsequently assessed and paid the full commercial rate.

Column 1 represents the type of permit and subclass marked on the mailpiece.

Column 2 contains volumes of Standard (A) Regular rate mail sent by a nonprofit organization under *regular rate* markings because the mailpiece was ruled to contain ineligible material that disqualified it for nonprofit rates. [See ANM/USPS-20]

Column 3 contains volumes of Standard A Regular rate mail sent by a nonprofit organization with *nonprofit rate* markings but, because the mailpiece was ruled to contain ineligible material that disqualified it for nonprofit rates, commercial rates were actually paid. [See ANM/USPS-20]

Column 4 contains volumes of Standard (A) Regular rate mail sent by a nonprofit organization under *nonprofit rate* markings that were later ruled to contain ineligible material that disqualified it for nonprofit rates. Commercial rates of postage were retroactively assessed these volumes. [See ANM/USPS-21]

Column 5 represents the answer to the question: "for how many (if any) of the pieces identified" [in column 4] was a revised Form 3602 filed?

**SURVEY:** A sample survey is attached. It was faxed, e-mailed and mailed to hundreds of nonprofit mailers. (It is impossible to identify how many nonprofit executives received the survey because it was copied and recopied by other "umbrella" nonprofit organizations.) For surveys that were incomplete, phone calls were made to supplement the filing.

**SUMMARY:**

At the time and point of entry:

- Column 2 demonstrates that 31 organizations paid commercial rates and used regular rate indicia.
- Column 3 demonstrates that 49 organizations paid commercial rates but used nonprofit markings.
- Column 4 demonstrates that 28 organizations entered nonprofit mail at nonprofit rates and with nonprofit markings, but later were assessed regular rates. Of those 28 mailers, at least 13 organizations were certain that a corrected USPS Form 3602-R had been filed.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

David M. Levy/dm

February 10, 1998